

REMARKS

In the Office Action, claims 1-37 were objected to, claims 1-11 and claims 13-37 were rejected. By the present Response, claims 13, 19, 24, 30, 35 and 37 are amended. Upon entry of the amendments, claims 1-37 will remain pending in the present patent application. Reconsideration and allowance of all pending claims are requested. No new subject matter has been added.

Objections to the Claims

The Examiner raised an objection on account of informalities in the form of an absence of suitable text prior to the beginning of the section on claims, non-compliance with typical numbering procedure of claims, and absence of conventional indentation in claims.

The Applicants believe that the informalities recited by the Examiner originated from the electronic filing. By this present response, the informalities have been eliminated. Since these informalities were not part of the original file, the changes have not been indicated. In the event the Examiner wishes that the Applicants show the changes to indicate the conventional numbers added, the Applicants encourage the Examiner to indicate. The Examiner is requested to construe the present response as a *bona fide* attempt by the Applicants to adequately respond to the Examiner's objections.

Rejections Under 35 U.S.C. § 102

Claims 1, 2, 13, 14, 24, 25, 27, and 28 were rejected under 35 U.S.C. § 102(e) as being anticipated by Hopple et al., U.S. Patent No. 6,546,124. Anticipation requires the disclosure in a single prior art reference of each element of the claim under consideration.

Based on the Examiner's analysis, the contrast modification processing value disclosed in claim 1 may be interpreted as the boost value determined from the look-

up tables (LUT) and the local mean intensity value. Also, the Examiner points out that the output intensity value may be interpreted as the signal left after the boost output is processed with the input signal (the input intensity processing value).

The Applicants respectfully submit that in the present application, the output intensity value for each local mean estimate is generated based on only the generated contrast modification processing value and the input intensity value. More particularly, in the present technique, a contrast modification value and the mean modification processing value are multiplied to generate a first value. The first value is subsequently divided by the local mean estimate to generate a second value. A look-up table is accessed with reference only to the second value to generate a contrast modification processing value (comparable to the boost value in the Hopple reference). In the present application, the output intensity value is generated based on only the contrast modification processing value and the input intensity value.

On the contrary, Hopple discloses that the look-up table is addressed based on a local mean intensity value. An output from the look-up table is then applied to a local mean intensity value to obtain a boost output that is expressed as a percentage of the local mean intensity value. The output of the boost component is further subtracted from an input signal by an ADD component. The Hopple reference, also, does not disclose in precise terms about how the various components are calculated and related. Accordingly, any similarity between the boost value in the Hopple reference and the contrast modification processing value cannot be reached.

Similarly, the Applicants request that independent claims 13 and 24 are also allowable. Therefore, for at least the above reason, the present invention as claimed in claim 1, 13, and 24 are not anticipated by the Hopple reference. Claims 2-11, 14-23, and 25-34 depend directly or indirectly on claims 1, 13, and 24 respectively. Accordingly, the Applicants request that the claims 2-11, 14-23, and 25-34 are

allowable by virtue of their dependency from the allowable base claims, as well as for the subject matter they separately recite. Thus, it is respectfully requested that the rejections of claims 1-11, claims 13-34 under 35 U.S.C. §102(e) be withdrawn.

Rejections Under 35 U.S.C. § 103

Claim 35 was rejected under 35 U.S.C. § 103(a) as being unpatentable over the combination of Hopple et al., U.S. Patent No. 6,546,124 and Lee, U.S. Patent No. 6,711,302. Claim 37 was rejected under 35 U.S.C. § 103(a) as being unpatentable over Hopple et al., U.S. Patent No. 6,546,124 in view of Bell et al., U.S. Patent No. 6,370,265.

Since the Hopple reference has been shown to not qualify as the basis of rejections made under 35 U.S.C §102(e), the Applicants submit that a *prima facie* case of obviousness has not been established by the Examiner to qualify claims 35 and 37 for rejection under 35 U.S.C. § 103(a). Claim 36 is allowable by virtue of its dependency from the allowable base claim 35, as well as for the subject matter it separately recites.

Also, the Applicants would like to point out that since the present application was filed on August 8, 2001, the Hopple reference may not be used as prior art under 35 U.S.C §103(c) on account of the applications sharing a common assignee "General Electric Company". Thus, since the primary reference has been shown as not being a valid prior art, the Applicants submit that any rejection under 35 U.S.C §103(a) using the Hopple reference is not possible. Thus, it is respectfully requested that the rejections of claims 35-37 under 35 U.S.C. §103(a) be withdrawn.

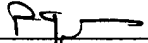
Conclusion

In view of the remarks and amendments set forth above, Applicants respectfully request allowance of the pending claims. If the Examiner believes that a

telephonic interview will help speed this application toward issuance, the Examiner is invited to contact the undersigned at the telephone number listed below.

Respectfully submitted,

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